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February 15, 2024

The Honorable Judge Sean H. Lane
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4140

Re: In re Genesis Global Holdco, LLC, et al. (Case No. 23-10063)
Request for Emergency Chambers Conference Regarding Several Discovery Disputes
Regarding the Hearing on the Debtors' Settlement Motions

Dear Judge Lane,

On behalf of Digital Currency Group, Inc. and DCG International Investments, Ltd. (collectively, “**DCG**”), we write to respectfully request an emergency conference in the above-captioned chapter 11 proceedings (the “**Chapter 11 Cases**”) to resolve several discovery disputes regarding the upcoming hearing on the Debtors’ motions for approval of various settlements, including the Debtors’ settlement with the New York State Office of the Attorney General. The disputes concern deposition notices and subpoenas issued to Tom Conheeney (one of two directors of the Special Committee of the Debtors), Cleary, Gottlieb, Steen & Hamilton (counsel for the Debtors), and Proskauer Rose LLP (counsel for the Ad Hoc Group).

We request a conference tomorrow, February 16. Counsel for DCG, the Debtors, and various other parties-in-interest will be in a deposition relating to the Debtors’ motion to approve their agreement with the New York State Office of the Attorney General from 10:00 AM ET to 1:00 PM ET. DCG respectfully requests that—if the Court’s schedule permits—the emergency conference be scheduled before or after the deposition. If the Court’s schedule does not permit such a time for the emergency conference outside of the deposition window, DCG will make itself available as requested by the Court.

Sincerely,



Jeffrey D. Saferstein, Esq.

cc: Jessica Liou, Esq.
Furqaan Siddiqui, Esq.